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ALAMEDA POINT
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

November 6, 1998

OPTIONAL FORM 99 (7-90)
FAX TRANSMITTAL
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To Patricia McFadden
From Lynn Suer
Dept./Agency EPA West
Phone # 744-2396
Fax # (650) 244-2774
Fax # (415) 744-1916
NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

Mr. Patricia McFadden
Department of the Navy
Engineering Field Activity, West
Naval Facilitites Engineering Command
900 Commodore Drive, B208(U)
San Bruno, California 94066-5006

RE: Comments on Revised Draft OU-1 Remedial Investigation Report, Alameda Point, dated September 3, 1998; Resolution to EPA Comments Draft OU1 RI for Alameda Point, September 10, 1998

Dear Ms. McFadden:

U.S. EPA staff have reviewed the above referenced documents. The revised draft RI Report is a significant improvement over the previous version, and we appreciate the efforts by the Navy and Navy's contractors to meet with the regulators and engage in the discussions that have led to these improvements. We are pleased that so many of our comments and suggestions have been incorporated into this document. We commend the Navy for being cooperative for so many portions of the Revised Draft.

There are still some major concerns that need resolution, which are presented in the attached comments. However, we feel that the OU1 RI Report can move forward to Draft Final, if these comments are addressed.

If you have questions, please call us at (415)744-2396 or (415)744-2367.

Sincerely,

Lynn Suer
Remedial Project Manager

Anna-Marie Cook
Remedial Project Manager

Attachments (2)
cc: See next page

cc: Mary Rose Casea, DTSC
Steve Edde, Alameda Pt.
Patricia McFadden, EFA West
Elizabeth Johnson, ARRA
Ken Kloc, RAB

U.S. EPA Comments on
Revised Draft OU-1 Remedial Investigation Report
Alameda Point
dated September 3, 1998

General Comments:

1. EPA has consistently stated on many occasions that the Remedial Investigation must evaluate risk under the residential use scenario at all sites to determine the need for a remedy. Evaluating the residential scenario in the RI does not necessarily result in clean-up to residential standards. A remedy may be an institutional control such as a deed restriction, or an action such as treatment or removal of contaminants. Planned reuse is relevant to consider when evaluating remedial alternatives in the Feasibility Study (FS) Report, but is not relevant in determining whether a site should be carried into the FS Phase of the CERCLA process.

   Therefore, the results of the risk assessment for residential scenario should be presented in Volume 1 and included in the discussion for all sites, including Sites 15 and 16. The calculations may be included in an Appendix. The RI currently presents the results of the residential use scenario for Sites 15 and 16 as Attachment 2 of Appendix D. This is very cumbersome for the reader, as it requires consulting two separate volumes to fully evaluate the site.

2. "Dual tracking" has not been fairly implemented in this document, as the more conservative DTSC/Region IX risk estimates are not presented alongside the Navy risk estimates in Volume 1. In addition, the reason for dual-tracking has not been adequately explained, and the reader comes away with the impression that the Navy risk estimates address EPA Region IX's concerns.

   EPA does not concur that the Navy calculations are based on EPA Headquarters guidance with respect to the soil inhalation pathway. EPA Headquarters guidance is implemented through the Regions, and Region IX does not agree with the Navy at Alameda's interpretation of EPA Headquarters guidance. Therefore, the OU1 RI may not refer to the Navy calculations as EPA Headquarters calculations. It should be noted that Alameda Point is the only base which has elected to interpret EPA Headquarters guidance in this manner. All other federal and private facilities in Region IX use regional methodology in conducting human health risk assessments.

   EPA supports DTSC's risk estimates. This is because the DTSC methodology is consistent with the Region IX methodology and it is appropriate to use the more stringent State toxicity values for chemicals with both Federal and State toxicity values. EPA has not reviewed the Navy's risk calculations in the Revised Draft.

As already stated in our original comments, Region IX's preference is to present only one risk estimate in the Remedial Investigation Reports at Alameda Point. Dual-tracking was the "*resolution*" reached for the Environmental Baseline Survey (EBS), but we had hoped that Remedial Investigation Reports would present only one set of risk estimates. The dual-tracking approach is cumbersome and has not provided any benefit to the Navy, agencies, or community in the EBS Process. It is in the best interests of all parties to use a single risk estimate based on the most conservative methodology and toxicity values.

EPA will agree to dual-tracking, if the Navy insists. However, the presentation of dual values must be fairly, with both risk estimates presented side-by-side in Volume 1, so that they can be easily compared. In the event of a significant difference in the two estimates, the agencies will use the DTSC risk estimate for making decisions.

3. The statement that domestic groundwater use at Alameda Point is improbable is not relevant as a justification for no action. The groundwater fits the federal definition of a potential drinking water source and, because of the classification, needs to have domestic use evaluated as a potential exposure pathway (which has been done). If the risk is sufficiently high, then some sort of remedy will need to be put in place; if the risk is sufficiently low, then a remedy for groundwater is not necessary. Making guesses as to the likely use of the groundwater in the future does not affect the risk levels or the classification. It is next to impossible to predict human activity in the future.

4. The Executive Summary should provide a reader-friendly "snapshot" of each site which summarizes, perhaps in tabular form, the sources, conceptual site model, human health risk estimates (both DTSC/EPA Region IX and Navy estimates), ecological risk, COCs, and any other information that would provide a good picture of the site.

Specific Comments:

1. **Executive Summary, P. ES-2, Paragraph 3.** The results of the DTSC/EPA Region IX HHRA should be summarized, in addition to the Navy's HHRA, as per the "dual tracking" agreement. In addition, the results of the residential use risk estimates should be summarized and discussed, since this is the relevant exposure scenario for determining if further action is needed.

   Based on DTSC/EPA Region IX risk estimates, three sites in OU1 (Sites 7, 8, and 15) should be considered for further action, since estimates of total risk exceed the 10E-4 to 10E-6 risk range. Sites 6 and 16 fall within the risk range and may be considered for risk management with sufficient justification. The Navy, using its own risk estimates, has identified only Site 7 for further action.

2. **Chapter 5, pp. 5-2 to 5-3.** This section should fully explain the agreement reached by the agencies to "dual track" the risk assessment, with EPA Region IX supporting the

DTSC risk estimates for purposes of decision-making. It is inaccurate to state that the Navy/EPA HQ represents EPA federal guidance with incorporation of EPA Region 9 methodologies, given the unresolved dispute regarding the soil inhalation pathway. See general Comment No. 2.

3. **Section 5.1.5, p. 5-17.** The first paragraph summarizes uncertainties associated with toxicity values, but only briefly mentions uncertainties associated with the lack of toxicity values. Since this uncertainty is the reason for dual-tracking, the impact of this uncertainty should be described in greater detail (i.e. for which pathways/chemicals will risk or HIs be underestimated?).

4. **Section 5.2.4, pg. 5-24 and Tables N-1 and N-3.** References in support of all exposure parameters should be included in this report, together with a discussion of how any factors were modified or derived from the literature information. References for the "literature-derived" biotransfer factors, site-use factors, and other exposure parameters could not be located within the document. These references and discussion should appear in the RI even if they were already presented in the work plan.

5. **Section 5.2.4, pg. 5-24.** The Navy must clearly present the procedure used for allometric conversion of the Toxicity Reference Values developed by the Navy and the U.S. EPA Region 9 Biological Technical Assistance Group (BTAG). It is not possible to determine if the conversion has been done in a manner acceptable to EPA's Biological Technical Advisory Group (BTAG).

6. **Section 5.2.4, pp. 5-24 to 5-25.** For the estimation of HQ_2, the assumptions of the high end of a receptor's ingestion rate and the low end of a receptor's body weight theoretically produce the most conservative risk estimate. However, if the low end weight is associated with a juvenile individual, then the use of a high end ingestion rate is likely to be completely unrealistic and overly conservative. Where HQ_2 values greater than 1 are encountered, the Navy could best address this issue by carrying the entire hazard quotient analysis through the beginning of Step 3 of the US EPA Superfund ecological risk assessment process (US EPA 1997). At the start of Step 3, hazard quotients may be reevaluated using more realistic assumptions. A reasonable approach would be to calculate a range of hazard quotients separately for juveniles and breeding and non-breeding adults using appropriate body weights and exposure factors for each group. These hazard quotients would be calculated using the range of exposure point concentrations from the site. Using this approach, each contaminant of concern could be considered independently and, if below the critical level, dropped from further consideration.

Site 6

7. **Section 6.1.3.** The site conceptual model should include a discussion of the effects of the sheet piling on the northern edge of the seaplane lagoon on the groundwater flow for Site 6.

8. **Section 6.1.5.2.** Again, the impact from the sheet piling south of Site 6 on groundwater flow directions and gradients should be discussed here.

9. **Section 6.1.6.2 and Figure 6-1j.** The VOC plume described in this section and shown on the figure does not address the area downgradient of the washpad, paint stripping tank and oil/water separator area. Since this area is a likely source of solvent contamination and groundwater flow in this area is southeast, some follow-up sampling should be conducted downgradient to determine whether this area is a source. The hit of 1,2-DCE downgradient in well M06-0 may be the edge of the plume originating from the washpad area. Have concentrations of 1,2-DCE decreased over time? The statement is made that they have not increased and therefore it is unlikely that there is a continuing source. However, the argument would be far more compelling if the concentrations were decreasing.

Site 7

10. **Section 6.2, first paragraph.** The last sentence should also mention that a carwash operated at Site 7. This was noted during a recent site visit, during which painted words on the concrete, indicating the location of the carwash, were observed. In addition, the site conceptual model should consider the car wash as a potential source of contamination.

11. **Table 6-2b.** What sediments (as opposed to soils) were sampled in 1994 (CTO 280)?

12. **Figure 6.2d.** This figure shows only two of the four geologic units at the site. Please consider including the second water bearing zone in the fence diagram, as this is frequently referred to in the text and is contaminated.

13. **Section 6.2.1, 4th paragraph.** Why was soil removed from UST 459-7 pit to a depth of 2 feet? Was no contamination found below this depth or was it an arbitrary decision with possible contamination left in place?

14. **Section 6.2.3, second paragraph.** This paragraph should also describe the storm drain as a potential exposure pathway to ecological receptors in Seaplane Lagoon.

15. **Section 6.2.3.** It is stated that fuel could percolate to the groundwater from the tanks. In Section 6.2.2 it is stated that groundwater is at 2.5 to 4 feet bgs. Would this mean that parts of some tanks are situated beneath the water table? This fact would modify the site conceptual model somewhat and account for the high levels of BTEX seen in the

groundwater samples.

16. **Section 6.2.5.2.** It is stated that groundwater from this site discharges to an off-site drainage ditch along Main Street (outside the fence line), which discharges via a pump station to the Bay. Section 6.2.8.2 does not assess this pathway for contaminated groundwater to the Bay when evaluating fate and transport mechanisms. Please include this pathway in the evaluation, and also evaluate any potential threats to human health and ecological receptors from exposure to soils or surface water in the drainage ditch. In view of the migration of contaminated groundwater and soil vapor onto non-Navy property, immediate action to control migration should be considered.

17. **Section 6.2.5.2. paragraph 6.** The statement that hydraulic communication between the FWBZ and the SWBZ is minimal is not borne out because BTEX contamination is present in the SWBZ (see Section 6.2.6.3). The vertical gradient is downward because BTEX is lighter than water and would not preferentially sink to the SWBZ. Remediation of the groundwater at this site must take into account the lack of an adequate hydraulic barrier between the two zones.

18. **Section 6.2.5.2 and Figure 6-2a.** The groundwater flow direction show in Figure 6-2a does not seem to correspond to the flow directions given in the basewide potentiometric surface map (Figure 2-14d). Please resolve and report the reason for this discrepancy.

19. **Section 6.2.6., p. 6-35.** The data for this site is very old (soil vapor data was collected in 1991). It is likely that additional sampling will be needed to select an appropriate remedy.

20. **Section 6.2.6.2 and Section 6.2.8.1.** The cluster of high lead hits at Site 7 indicates a release of some kind. Since the levels are well above the levels remediated at Site 15 and 16, EPA recommends performing a small removal action to eliminate the hot spot.

Site 8

21. **Figures 6.3b.** The drawing of the site conceptual model does not label the pesticide storage shed or show the separator pits. Please revise to emphasize these potential sources.

22. **Section 6.3.3.** Based on observations made during a recent site visit, there are two separator pits within the courtyard, not one. Please revise to address potential contamination from both separator pits.

23. **Section 6.3.6.2 and Section 6.3.9.2.** Include the fuel line removal information to give a better explanation of the contaminant source for this site in the draft final RI. In addition, show the location of the fuel line in the conceptual site model and revise Figure 6-3 to

include data from the fuel line removal project.

24. **Section 6.3.10.** Since the oil/water separator pit is one likely source of contamination at Site 8, it would be useful to have groundwater data taken near the pit. Also, soil samples taken directly beneath the pit would determine whether this area was an ongoing source or not.

Site 15

25. **Section 6.4.7.1 and Section 6.4.9.1 and Section 6.4.10.2.** What is the explanation for the high lead levels clustered outside the northern fencelike on the site? Why was lead dropped as a site specific contaminant from soil when listing items to be considered in determining risk? Given that it was considered appropriate to conduct a removal action on a large portion of Site 15 for just such a lead problem, it does not make sense to say that lead is not a problem in an area immediately adjacent to the removal action area.

26. **Section 6.4.9.1.** It is stated that groundwater exposures pathways are incomplete for this site because the types of activities that may occur do not involve domestic groundwater use. This statement is incorrect in two ways. Firstly, future use at the site does not determine exposure pathways for groundwater - the criteria for groundwater classification (i.e. TDS and yield) are used. Secondly, exposure pathways such as dermal contact and inhalation are present for construction worker, occupational and, possibly, recreational scenarios. Digging into the groundwater in the course of construction work, using groundwater for irrigational or industrial purposes, using it for artificial ponds and fountains are all potential exposure pathways that exist in addition to those presented by domestic use. Please revise this section.

27. **Section 6.4, pp. 6-85 through 6-108.** It is not possible to determine if the initial screening evaluation of the Site 15 soils (within the designated site borders) using $_{HQ}$ and HQ_2 is acceptable, in light of Comments 4, 5, and 6. However, the Navy's approach to the PCB, DDT and lead contamination present in the soil represented by samples S15-56 through S15-62 is unacceptable. These contaminants are all bioaccumulative and so require special attention. The Navy should evaluate the contaminant concentrations at these sampling points as a source of bioaccumulative compounds to both terrestrial receptors and marine receptors in the Inner Harbor. Furthermore, even if sampling points S15-56 through S15-62 are beyond the site boundary and not related to Site 15 activities, contamination at these points must be addressed, as these indicate a release that poses a threat to human health and the environment.

Attachment

Re: Response to Navy's "Resolution to EPA Comments, Draft OU1 RI for Alameda Point", dated 10 Sept 98.

General Comments:

1. This document refers to individuals in many different ways. Examples are: Lynn Suer, LS, Dr. James Polisini, Mr. Tom Lanphar, Sophia. Sophia Serda is repeatedly referred to by first name only (p. 4 of 4), and is the only person referred to in this manner. This is not appropriate.

   In the future, all individuals should be referred to by first and last name. If additional designations such as "Dr. or Mr." are used, they should be used consistently for all persons to whom they apply.

2. In the future responses to comments should first state the reviewer's comment, then give the Navy's response. This is the procedure typically used, and is far more convenient than having to flip between documents. To facilitate this our comments on the Draft Final OU-1 RI are being sent electronically, as well as by mail.

Lynn Suer's Comments

1. The Navy's response does not capture the agreement that was made during the 4/29/98 meeting. EPA did not agree that the residential use scenario could be included in an appendix, separate from the main body of the text. Further, EPA did not agree to disregard the residential use scenario in the evaluation of sites for which other land uses (e.g., recreational) have been planned. Rather, EPA has consistently stated on many occasions that the Remedial Investigation must evaluate risk under the residential use scenario at all sites to determine the need for a remedy. A remedy may be an institutional control such as a deed restriction, or an action such as treatment or removal of contaminants. Other proposed land use scenarios are relevant when evaluating remedial alternatives in the Feasibility Study (FS) Report, but are not relevant in determining whether a site should be carried into the FS Phase of the CERCLA process.

   Evaluating the residential scenario in the RI does not necessarily result in clean-up to residential standards. A remedy will be required if the site is not suitable for unrestricted (residential) use. However, the remedy may be a deed restriction, fencing or other institutional control. The goal of the remedy will be established in Remedial Action Objectives. A range of alternative remedies will be considered in the FS Report.

Therefore, the results of the risk assessment for residential scenario should be presented in Volume 1 and included in the discussion for all sites, including Sites 15 and 16. The calculations may be included in an Appendix. The RI currently presents the results of the residential use scenario for Sites 15 and 16 as Attachment 2 of Appendix D. This is very cumbersome for the reader, as it requires consulting two separate volumes to fully evaluate the site.

2. Concur.

3. Although we agreed to postpone consideration of ground water migration through storm drains until the OU4 RI report, it would be more efficient to consider these impacts in planning the repair and/or replacement of the storm drains. A Stormdrain Study Report was due on 10/23/98. It may be necessary to accelerate consideration of ecological impacts due to ground water migration in order to completely review this report. In addition, postponement may hold up transfer of property where stormdrains need repair.

4. Concur

5. This response would be more complete if it pointed out that for most, if not all of the OU1 sites, there are only four quarters 1994-95 ground water monitoring data. This very limited data set has been supplemented with more recent sampling events, but the more recent data have not been included in this Remedial Investigation Report. These additional data should be evaluated prior to developing a Feasibility Study Report, as they may affect the remedy selection.

6. Concur
7. Concur
8. Concur
9. Concur
10. Concur
11. Concur
12. Concur
13. Concur
14. Concur

15. We acknowledge that the Navy feels the ARARS in the draft RI are specific. However, chemical and location-specific ARARs can only be determined site by site. As already stated, EPA attorneys will not review ARARs until they are presented in the Feasibility Study Report.

16. Concur
17. Concur
18. Concur

19. It is not unusual to identify data gaps during the Feasibility Study or RD/RA phases of the CERCLA clean-up process. The Navy should be prepared to conduct additional field work if it is needed for the selection or design of remedies.

Mark Filipini's Comments, GENERAL

1. Concur
2. Concur
3. Concur
4. Concur
5. Concur

Mark Filipini, SPECIFIC

1. Concur
2. Concur
3. Concur
4. Concur
5. Concur

Ned Black's Comments

1. Concur
2. Concur
3. Concur

4. Although these comments specifically address the risk assessment for Site 14, they apply to all sites at Alameda Point which pose potential risk to ecological receptors (e.g. Site 15). Therefore, the Navy's response to this comments, which essentially defers discussion of the issues to a later time, is not adequate.

Sophia Serda's Comments

1. This response needs revision to accurately reflect the resolution that was reached. First, EPA does not concur that the Navy calculations are based on EPA Headquarters guidance with respect to the soil inhalation pathway. EPA Headquarters guidance is implemented

through the Regions, and Region IX does not agree with the Navy at Alameda's interpretation of EPA Headquarters guidance. Therefore, the OU1 RI may not refer to the Navy calculations as EPA Headquarters calculations. It should be noted that Alameda Point is the only base which has elected to interpret EPA Headquarters guidance in this manner. All other federal and private facilities in Region IX use regional methodology in conducting human health risk assessments.

Second, the resolution should state that EPA supports DTSC's risk estimates. This is because the DTSC methodology is consistent with the Region IX methodology and it is appropriate to use the more stringent State toxicity values for chemicals with both Federal and State toxicity values. EPA will not be reviewing the Navy's risk calculations.

As already stated in our original comments, Region IX's preference is to present only one risk estimate in the Remedial Investigation Reports at Alameda Point. Dual tracking was the "resolution" reached for the Environmental Baseline Survey (EBS), but we had hoped that Remedial Investigation Reports would present only one set of risk estimates. The dual tracking approach is cumbersome and has not provided any benefit to the Navy, agencies, or community in the EBS Process. It is in the best interests of all parties to use a single risk estimate based on the most conservative methodology and toxicity values.

EPA will agree to "dual tracking", if the Navy insists. However, the presentation of dual values must be fairly, with both risk estimates presented side-by-side in Volume 1, so that they can be easily compared. In the event of a significant difference in the two estimates, the agencies will use the DTSC risk estimate for making decisions.

2. Concur
3. Concur
4. Concur
5. Concur
6. Concur
7. Concur
8. Concur

9. Although we have agreed to accept risk estimates based on out-of-date toxicity values for the OU1 RI Report, we generally support the concept of incorporating up-to-date toxicity values, as soon as they are available, and expect this will be done for all future RI Reports.

10. Concur
11. Concur

12. Concur
13. Concur
14. Concur

15. As already stated, EPA recommends the calculation and presentation of total risk, which includes both site- and non-site related risk. This issue has not yet been resolved.

16. Concur. However, it would be useful to include a statement in the RI, to the effect that there are no radiological concerns in OU1.

17. Concur
18. Concur
19. Concur

Tetra Tech EM Inc.

10670 White Rock Road, Suite 100 ◆ Rancho Cordova, CA 95670 ◆ (916) 852-8300 ◆ FAX (916) 852-0307

October 16, 2000

Mr. Lou Ocampo, PE
Remedial Project Manager
Naval Facilities Engineering Command
BRAC Operations, Southwest Division
1230 Columbia Street, Suite 1100
San Diego, California 92132-5190

Subject: **Various Correspondence from Regulatory Agencies for inclusion into the Administrative Record for the Fleet and Industrial Supply Center, Oakland Alameda Facility/Alameda Annex, or Alameda Point, Alameda, California CLEAN Contract No. N62474-94-D-7609, Contract Task Order No. 271**

Dear Mr. Ocampo:

Per your request enclosed is one copy of the following correspondence for your files:

- Draft Operable Unit (OU)-1 Remedial Investigation (RI) comments from United States Environmental Protection Agency (EPA), dated April 10, 1998.
- Draft OU-1 RI comments from Department of Toxic Substance Control (DTSC), dated April 15, 1998.
- Revised Draft OU-1 RI comments from DTSC, dated November 3, 1998.
- **Revised Draft OU-1 RI comments from EPA, dated November 6, 1998.**
- EPA Review of Draft Final Marsh Crust Feasibility Study for Alameda Annex and Alameda Naval Air Station dated February 7, 2000.
- DTSC comments on Draft Final Feasibility Study for the Marsh Crust and Groundwater at the Fleet and Industrial Supply Center, Oakland Alameda Facility/Alameda Annex and for the Marsh Crust and Former Subtidal Area at Alameda Point dated February 7, 2000.
- EPA comments on the Action Memorandum for Marsh Crust Time-Critical Removal Actions at East Housing Area dated March 14, 2000.
- EPA Review of Public Draft Record of Decision/Remedial Action Plan for Marsh Crust and Groundwater at Alameda Annex and Marsh Crust and Former Subtidal Area at Alameda Point dated July 19, 2000.

Six copies of each correspondence have been forwarded to Ms. Dianne Silva for inclusion into the administrative record files at Alameda Facility/Alameda Annex or Alameda Point.

If you have any questions, please call me at (916) 853-4512.

Sincerely,

Mark R. Reisig
Project Manager

Enclosure

cc: Ms. Diane Silva, Navy Information Repository (3 copies of each)
File

TC.0271.10613

TETRA TECH EM INC.

TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N62474-94-D-7609 Document Control No. TC . 0271 . 10613

TO: Mr. Richard Selby, Code 02R1
Contracting Officer
Naval Facilities Engineering Command
Southwest Division
1230 Columbia Street, Suite 1100
San Diego, CA 92132-5190

DATE: 10/16/00
CTO: 0271
LOCATION:
Alameda Annex, Alameda

FROM: Greg Swanson
Daniel Chow, Program Manager

DOCUMENT TITLE AND DATE:

Various Correspondence from Regulatory Agencies for inclusion into the Administrative Record for the Fleet and Industrial Supply Center, Oakland Alameda Facility/Alameda Annex, or Alameda Point, Alameda, California. Dated October 16, 2000 (These documents are forwarded to Ms. Diane Silva for inclusion into the Alameda Annex or Alameda Point information repository.)

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